

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MELINDA SGARIGLIA,	)	
	)	1:19-cv-05684
Plaintiff,	)	
	)	
v.	)	Honorable Judge Robert W.
	)	Gettleman
AMERICAN INTERNATIONAL RELOCATION	)	
SERVICES, LLC, D.B.A. AIRES, AN ILLINOIS	)	
LIMITED LIABILITY CORPORATION,	)	
NICHOLAS GONRING & KELLY GONRING.,	)	
	)	
Defendants.	)	

**PLAINTIFF'S FINAL MOTION FOR EXTENSION OF TIME**

NOW COMES the Plaintiff, Melinda Sgariglia, Inc., by and through her attorney, Carol Oshana of Oshana Law, and in support of her Fourth and Final Motion for Extension to file Motion for Summary Judgment on damages, states as follows:

**FACTS**

1. On June 20, 2019, Plaintiff Melinda Sgariglia filed her Complaint for a violation of the Residential Real Property Disclosure Act, 765 ILCS 77/35, Fraud and Breach of Contract in the Circuit Court of Cook County, Chancery Division.
2. Defendants moved the matter to the United States District Court for the Northern District of Illinois, Eastern Division.
3. On January 18, 2024, this honorable Court entered an Order requiring the Plaintiff to file a Motion for Summary Judgment.
4. On March 18 2024, this honorable court gave an extension through April 15, 2024 for Plaintiff to file her Motion for Summary Judgment on damages.

5. On April 19, 2024, this honorable Court permitted Plaintiff to file her damages summary on May 17, 2024.
6. Plaintiff's counsel has worked diligently on the Motion for Summary Judgment and is near completion. However, Ms. Oshana has learned that the Association has done additional repairs. The expert witness Steve Hier's last site visit will be this Monday, May 20, 20234.
7. Ms. Oshana needs a few more days to finalize the Motion and talk to Mr. Hier.
8. Defendant will not be prejudiced by the delay and had previously indicated his agreement to extensions.
9. Plaintiff's counsel left an email and voicemail and email to counsel but has not heard back about whether he objects or not. (See attached email).

WHEREFORE, for the foregoing reasons, Plaintiff, by and through her attorney, Oshana Law, respectfully requests that this Honorable Court grant the parties an extension of 30 days to file her Motion for Summary Judgment, to Thursday, May 23, 2024. In addition, Plaintiff asks that the Defendants be afforded an additional 60 days thereafter to file their response, and for Plaintiff to be given 14 days to file her Reply.

Respectfully submitted,  
MELINDA SGARIGLIA,

By: /s/ Carol Oshana  
One of her attorneys

Carol Billie Oshana  
OSHANA LAW  
20 North Clark Street, Suite 3000  
Chicago, IL 60602  
(312) 404-8390  
ARDC: 6243613  
May 17, 2024

## Re: Joint Status Report on Damages Sgariglia v. AIRES / Gonrings

From: oshanalaw@yahoo.com (oshanalaw@yahoo.com)

To: jfinfer@pfs-law.com

Date: Friday, May 17, 2024 at 10:19 AM CDT

Hi Jordan,

I left you vm. I'm almost done with my MSJ. I need one more week, I plan to file it Thursday. Please advise if I can extend all dates.

Carol Oshana, Esquire  
Oshana Law  
20 North Clark, Suite 3000  
Chicago, IL 60602  
312-404-8390

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On Friday, March 15, 2024 at 06:35:42 PM CDT, Jordan A. Finfer <jfinfer@pfs-law.com> wrote:

Hi - I don't have an objection to that.

Jordan

**| P | F | S |**

**Jordan A. Finfer**

**Direct.** (312) 205.4462

**Mobile.** (847) 899.2688

**email.** jfinfer@pfs-law.com

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On Mar 15, 2024, at 6:30 PM, Oshana Law <oshanalaw@yahoo.com> wrote:

Hi Jordan do you object to a motion to extend? I need another 30 days. I'll extend all dates of course.

*PLEASE NOTE OUR NEW ADDRESS!*

Carol Billie Oshana  
20 N. Clark Street, Suite 3000  
Chicago, IL 60602  
312/404-8390 (Direct)

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On Friday, December 8, 2023 at 10:46:37 PM GMT+2, oshanalaw@yahoo.com <oshanalaw@yahoo.com> wrote:

Please see attached. I will file another Motion for Extension, how much time do you need?

Carol Oshana, Esquire  
Oshana Law  
20 North Clark, Suite 3000  
Chicago, IL 60602  
312-404-8390

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